

NO. 24-0753-C

LA VENTANA RANCH OWNERS
ASSOCIATION, INC.,
Plaintiff,

v.

JAKOB SKELTON AND STEPHANIE
CHANG A/K/A STEPHANIE SKELTON,
Defendants.

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IN THE COUNTY COURT

AT LAW NO. 1

HAYS COUNTY, TEXAS

PLAINTIFF'S FIRST SUPPLEMENTAL MOTION FOR SUMMARY JUDGMENT

TO THE HONORABLE JUDGE OF THIS COURT:

NOW COMES Plaintiff, La Ventana Ranch Owners Association, Inc. (hereinafter "*Plaintiff*"), in the above-styled and numbered cause, and files this *First Supplemental Motion for Summary Judgment* (hereafter, "*Plaintiff's Motion*") in order to correct the record regarding Plaintiff's argument that Defendants' admissions had been deemed admitted due to a failure to respond. To be clear, Defendants responded in accordance with a Rule 11 agreement, and did not default. Plaintiff presents the following supplemental information in its *First Supplemental Motion for Summary Judgment* and respectfully shows the Court the following:

I.
Supplemental Procedural History

Plaintiff's *Motion for Summary Judgment*, which was filed on January 9, 2025. Pursuant to Rule 166a, this Supplemental Motion (1) has been timely served on all parties more than 21 (twenty-one) days before the scheduling hearing on Plaintiff's Motion; (2) both incorporates and supplements Plaintiff's Motion; and (3) will be considered along with Plaintiff's Motion at the hearing.

On October 22, 2024, Plaintiff served *Plaintiff's First Set of Discovery Requests to Defendant Jakob Skelton* and *Plaintiff's First Set of Discovery Requests to Defendant Stephanie*

Chang a/k/a Stephanie Skelton. Defendants' responses were due on November 21, 2024, and the response deadline was extended by Rule 11 Agreement. Plaintiff inadvertently failed to calendar the Rule 11 discovery deadline extension in Plaintiff's Motion.

II.

Supplemental Legal Argument

Plaintiff continues to assert all of the arguments raised in *Plaintiff's Motion for Summary Judgment*, aside and apart from the argument that Defendants' admissions had been deemed for failing to respond.

Prayer

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully prays that the Court enter a summary judgment on the issues indicated Plaintiff's Motion for Summary Judgment and Plaintiff's First Supplemental Motion for Summary Judgment above for Plaintiff against Defendants Jakob Skelton and Stephanie Chang a/k/a Stephanie Skelton, in the amount of not less than \$54,000.00, costs of court, attorney's fees, as well as pre-judgment and post-judgment interest, all in accordance with the law.

Respectfully submitted,

CAGLE PUGH

By: /s/ Adam Pugh
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

By my signature, this is to certify that a copy of the foregoing document was served on Defendants by delivering a true and correct copy through the Court's e-filing system, on this the 7th day of February 2025, as follows:

Melissa Carr
DUBOIS BRYANT & CAMPBELL
303 Colorado, Suite 2300
Austin, Texas 78701

Via e-Service: mcarr@dbcllp.com

/s/ Adam Pugh
Adam Pugh

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Marla Jones on behalf of Nicholas Pugh

Bar No. 24044341

marla.jones@caglepugh.com

Envelope ID: 97120507

Filing Code Description: Motion (No Fee)

Filing Description: Plaintiff's First Supplemental Motion for Summary Judgment

Status as of 2/7/2025 1:03 PM CST

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